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SAN DIEGO

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May 18, 1993
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: NPRM PR Docket No. 92-235

In the Matter of the Notice of Proposed
Rule Making Concerning the Replacement
of Part 90 by Part 88 to Revise the
Private Land Mobile Radio Services and
Modify the Policies Governing Them
(Refarming)

Dear Secretary Searcy:

The City of San Diego is licensed for and operates two-way mobile Public Safety radio systems in the VHF High Band and UHF 450 to 470 spectrum. The City has been an active participant in the discussions and response preparation by California Public-Safety Radio Association (CPRA) a chapter of APCO. We concur fully with their comments in this matter, but would like to make the following additional comments:

1. The City is aware of the need for more efficient use of the available radio spectrum and supports the intent of the proposed rule making. We would remind the FCC of the serious problems experienced by licensees in the Mexican border areas. Therefore, we request that refarming plans be discussed and coordinated with Mexico with the goal of a formal signed treaty covering this spectrum;
2. The proposed 5 KHz channel spacing at VHF is inconsistent with Project 25 proposed standards, Federal spacing and proposed UHF Refarming spacing. Initial VHF channel spacing of 12.5 KHz would be consistent and could be more easily coordinated with Mexico. The U.S. could be assigned the channels midway between the current 25 KHz Mexican assignments, as primary channels, to ease problems in the border area;

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3. The schedules for implementation of the initial narrow banding to 12.5 KHz are unrealistically short especially in these times of tight budgets. These schedules, and any decisions on additional steps, should be delayed until hardware issues are resolved in accordance with APCO and CPRA recommendations;
4. We strongly oppose any fixed limitations on base station Effective Radiated Power (ERP) based solely on elevation, or Height Above Average Terrain (HAAT) for the Public Safety Radio Service. Instead we recommend that the use of Local Coordinators and a Regional Plan similar the NPSPAC plans for 800 MHz. These plans limit coverage based on political boundaries and thus are more appropriate and efficient.

We are grateful for the opportunity to submit the attached comments on the subject matter.


Coleman Conrad
Deputy City Manager

CC/DW/PS

cc: Gary Gray, Chairman CPRA Frequency Advisory Committee
Art McDole, Chairman APCO FCC Dockets Committee
Ronnie Rand, APCO Executive Director
Judith Bauer, Director Intergovernmental Relations
George Loveland, Director General Services
David Wood, Deputy Director GS/Communications and Electrical Div.
Paul Salter, Sr. Communications Engineer